

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA  
HARRISBURG DIVISION

In Re:	:	Case No.: 1:19-bk-03749
Ronna L. Valerio	:	Chapter 13
	:	
	:	
Debtor(s)	:	

MOTION TO MODIFY CONFIRMED PLAN

NOW COMES, Steven P. Miner, Esquire and Caldwell & Kearns, P.C., COUNSEL OF RECORD FOR Ronna L. Valerio Debtor and files the following Motion to Modify her Chapter 13 Plan and in support thereof avers the following:

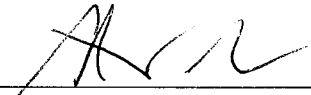
1. The Debtor filed a Chapter 13 Bankruptcy Petition on September 4, 2019.
2. Debtor filed the Chapter 13 Plan on October 25, 2019.
3. Debtor filed an Amended Chapter 13 Plan on April 21, 2020.
4. Order confirming Debtor's Amended Plan was entered on or about May 28, 2020.
5. Debtor filed a Second Amended Plan on or about October 19, 2021.
6. An Objection to the Second Amended Plan was filed on October 26, 2021.
7. Debtor wishes to amend her Chapter 13 Plan to remove mortgage arrears from Plan due to deferral agreement.

WHEREFORE, Debtor(s) respectfully request this Honorable Court approve his Motion to Modify her confirmed Chapter 13 Plan.

Respectfully submitted,

**CALDWELL & KEARNS, P. C.**

Date: 10/26/21

By:   
Steven P. Miner, Esquire  
I.D. No.: 38901  
3631 North Front Street  
Harrisburg, Pennsylvania 17110  
(717) 232-7661 (Office)  
(717) 232-2766 (Facsimile)  
[sminer@cklegal.net](mailto:sminer@cklegal.net)